

MAR 27 2018

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Petition for Waiver of Wireless Partners LLC to)
Participate in Mobility Fund Phase II Challenge)
Process)

To: The Commission

**PETITION OF WIRELESS PARTNERS, LLC
FOR WAIVER TO PARTICIPATE IN CHALLENGE PROCESS**

Wireless Partners, LLC (“Wireless Partners”) respectfully seeks a waiver to participate in the Mobility Fund Phase II (“MF-II”) challenge process. Wireless Partners is neither a governmental entity nor a carrier required to file Form 477 data with the Commission; as such, it is not entitled to participate in the challenge process as a matter of right.¹ In adopting the rule governing challenge eligibility, however, the Commission stated that it “anticipate[s] granting waivers in cases in which a ... business demonstrates a bona fide interest in the challenge process and a plausible ability to submit a valid challenge.”² As shown below, Wireless Partners meets these criteria.

Wireless Partners is a Maine-based, veteran-owned cellular telecommunications company that holds Commercial Mobile Radio Service (“CMRS”) licenses and designs, builds, owns, and operates carrier-grade 4G LTE cellular networks to provide voice and broadband data services in

¹ *Connect America Fund; Universal Service Reform – Mobility Fund*, Order on Reconsideration and Second Report and Order, 32 FCC Rcd 6282, 6303 ¶ 42 (2017) (“*Challenge Process Order*”) (challenge process limited to “government entities (state, local, and Tribal) and all service providers required to file Form 477 data with the Commission”).

² *Id.* at 6304 n.119.

unserved and underserved markets. Wireless Partners's networks support national operators and their subscribers through roaming and other commercial arrangements.

Wireless Partners has a bona fide interest in the challenge process. As a facilities-based provider of wholesale 4G LTE wireless voice and broadband services in rural, unserved, and underserved markets, Wireless Partners has concrete information regarding areas where wireless service is available and where it is not. This information would be useful to the Commission in the MF-II challenge process. In addition, Wireless Partners has demonstrated its interest in this proceeding, having previously filed reply comments and an ex parte letter presenting its views on issues related to MF-II, including the challenge process.³

Wireless Partners has a plausible ability to submit a valid challenge. Although it currently provides service on a wholesale basis, Wireless Partners possesses the resources of a facilities-based provider of 4G LTE wireless voice and data services. As such, it has experience with wireless network performance testing, including the use of network testing equipment. Thus, it will have the ability to submit valid challenges in the MF-II challenge process.

Additional information. The Commission requires waiver applicants to "submit the first and last name of the user(s) that should have access to the portal on its behalf, and the email address(es) of the user(s), up to a maximum of three users, as part of its petition for waiver."⁴ Wireless Partners provides the following information regarding the users that should have access to the challenge process portal on its behalf:

³ Reply Comments of Wireless Partners, LLP, WC Docket No. 10-90; WT Docket No. 10-208 (filed Feb. 10, 2017); Letter from Robert Parsloe, President and CEO, Wireless Partners, LLP, to Marlene Dortch, Secretary, FCC, WC Docket No. 10-90 and WT Docket No. 10-208 (filed June 21, 2017).

⁴ *Mobility Fund Phase II Challenge Process Handsets and Access Procedures for the Challenge Process Portal*, Public Notice, 32 FCC Rcd 10372, 10376 ¶ 10 (Rural Broadband Auctions Task Force 2017).

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For all of these reasons, Wireless Partners respectfully requests a waiver to participate in the MF-II challenge process.

Respectfully submitted,

WIRELESS PARTNERS, LLC

By: /s/
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March 21, 2018